

November 22, 2004

The Honorable Magalie Roman Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

Re: Southern California Edison Company Docket No. ER05-148-000

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene of the California Independent System Operator Corporation.

Thank you for your attention to this filing.

Respectfully submitted,

/s/ Anthony J. Ivancovich

Anthony J. Ivancovich

Counsel for the California Independent System Operator Corporation

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison	)	
Company	)	Docket No. ER05-148-000
	)	

## MOTION TO INTERVENE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214, and the Commission's November 8, 2004 Notice of Filing, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

#### I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

Anthony J. Ivancovich\*
Senior Regulatory Counsel
Deborah A. Le Vine <sup>1</sup>
Director of Contracts
California Independent System
Operator Corporation
151 Blue Ravine Road

Folsom, CA 95630 Tel: (916) 608-7135 Fax: (916) 608-7296 aivancovich@caiso.com dlevine@caiso.com David B. Rubin\* Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, D.C. 20007

Tel: (202) 424-7500 Fax: (202) 424-7643

\*Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)

#### II. BACKGROUND

On November 1, 2004, Southern California Edison Company (SCE) submitted revised rate sheets and Notices of Cancellation for the following agreements between SCE and the Department of Water Resources of the State of California (CDWR):

<u>Agreement</u> R	ate Schedule FERC No.	Effective Date
Power Contract Operating Procedures for SCE/CDWR	112	April 1, 1983
Power Contract and SCE/CDWR Agreeme For Emergency Services	nt 464	April 1, 1983
Agreement for Emergency Services	122	Dec. 14, 1980
Capacity Exchange Agreement	148	April 2, 1987

By its Notice issued November 8, 2004, the Commission established November 22, 2004, as the date motions to intervene are to be filed in the above-captioned proceeding.

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In addition to Mr. Ivancovich and Mr. Rubin, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Mr. Ivancovich and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

III. BASIS FOR MOTION TO INTERVENE

The ISO is a non-profit public benefit corporation organized under the laws

of the State of California and responsible for the reliable operation of a grid

comprising the transmission systems of PG&E, Southern California Edison

Company, San Diego Gas & Electric Company and the Cities of Vernon,

Anaheim, Azusa, Banning and Riverside, California. As the operator of this grid,

the ISO believes that it has a unique interest in any Commission proceeding

concerning the issues raised in the captioned proceeding.

IV. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the

Commission permit it to intervene, and that the ISO be accorded full party status

in this proceeding.

Respectfully submitted,

/s/ Anthony J. Ivancovich

Anthony J. Ivancovich Senior Regulatory Counsel California Independent System **Operator Corporation** 

151 Blue Ravine Road Folsom, CA 95630

Tel: (916) 608-7135

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Counsel for the California Independent

**System Operator Corporation** 

Date: November 22, 2004

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Folsom, CA, this 22nd day of November 2004.

<u>/s/ Anthony J. Ivancovich</u> Anthony J. Ivancovich